

RECEIVED

ORIGINAL
FILE

MAR 12 1991

LAW OFFICES

VERNER, LIIPFERT, BERNHARD, McPHERSON AND HAND

CHARTERED

SUITE 700
901-15TH STREET, N.W.
WASHINGTON, D.C. 20005-2301

(202) 371-6000

TELEX: 1561792 VERLIP UT

TELECOPIER: (202) 371-6279

HOUSTON OFFICE

6901 TEXAS COMMERCE TOWER
601 MILAM
HOUSTON, TEXAS 77002
(713) 237-9034
TELECOPIER: (713) 237-1216

VIRGINIA OFFICES

8280 GREENSBORO DRIVE 10484-A ARMSTRONG STREET
MCLEAN, VIRGINIA 22102 FAIRFAX, VIRGINIA 22030
(703) 749-6000 (703) 591-2883
TELECOPIER: (703) 749-6027 TELECOPIER: (703) 385-7998TERRENCE J. MCCARTIN
DEAN R. BRENNER
FRANCES C. DELAURENTIS
JOHN A. MENKE
LAWRENCE N. COOPER*
DON C. LEWIS*
LESLIE M. ALDEN*
LINDA E. COLLIER*
R. MICHAEL REGAN, JR.**
GENE R. SCHLEPPENBACH*
REBECCA M.J. GOULD*
JOHN S. MOOT*
RICHARD A. GLICK
MARK R. LEWIS
THERESA I. ZOLET
JOHN J. ACKELL*
SCOTT K. DAINES
DAVID P. HENDEL
LESLIE B. KRAMERICH*
E. JOHN KRUMHOLTZ
MICHAEL E. BELLER
RETA J. LEWIS

OF COUNSEL

PAUL C. SHEELINE
RICHARD H. SALTSMAN
CHARLENE A. STURBITTS
HOWELL E. BEGLE, JR.
BRUCE A. KIMBLE**ROBERT W. BLANCHETTE
NEIL T. PROTO
DOROTHEA SUMMERELL
MARY K. WILLIAMS** NOT ADMITTED IN DC
* ADMITTED IN VIRGINIA
* ADMITTED IN TEXASJAMES M. VERNER*
EUGENE T. LIIPFERT
EMERITUSBERL BERNHARD
HARRY McPHERSON
LLOYD N. HAND*
RONALD B. NATALIE
WILLIAM C. EVANS
MICHAEL J. ROBERTS
FRITZ R. KAHN
BERNHARDT K. WRUBLE
THOMAS J. KELLER
JOHN A. MERRIGAN
JOSEPH L. MANSON, III
WILLIAM H. CRISPIN*
CLINTON A. VINCE
GLEN L. ORTMAN
ERWIN G. KRASNOW
DOUGLAS M. STEENLAND
JAMES F. HIBEY
JULIA R. RICHARDSON
RUSSELL E. POMMER
GEORGE M. FOOTE, JR.*BUEL WHITE*
WILLIAM F. ROEDER, JR.*
ROY G. BOWMAN
AMY L. BONDURANT
HOWELL H. DARNEILLE, III
DOUGLAS OCHS ADLER
RILEY K. TEMPLE*
JOHN P. CAMPBELL*
MICHAEL J. BARTLETT*
DOUGLAS J. COLTON
JOHN H. ZENTAY
FRED W. DROGULA
ANDREA JILL GRANT
GARY J. KLEIN
J. CATHY FOGEL
JOHN B. CONNOR**
LAWRENCE R. SIDMAN
ALBERT HALPRIN
WILLIAM E. KENNARD
BENJAMIN H. FLOWE, JR.
FREDERICK J. TANSILL*
PAUL E. NOROSTROM
SHERRY A. QUIRK
J. RICHARD HAMMETT*LOUIS F. BESIO
VICE PRESIDENT FOR
FINANCE AND ADMINISTRATION
*RITER'S DIRECT DIAL NUMBER

(202) 371-6211

March 12, 1991

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554Re: Northern Telecom Comments on the
Telocator Rulemaking Petition; RM No. 7617

Dear Ms. Searcy:

Northern Telecom Inc. inadvertently filed an incorrect version of its comments on the Telocator petition for rulemaking seeking an allocation for advanced messaging service. Please substitute this corrected version of its comments. If you have any questions, please direct them to the undersigned.

Sincerely,


Stephen L. Goodman
No. of Copies rec'd 0+5
List A B C D E

ORIGINAL
FILE

RECEIVED

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

MAR 12 1991

Federal Communications Commission
Office of the Secretary

In the Matter of

Telocator Petition For Rulemaking to
Amend Part 22 of the Commission's Rules
Concerning the Use of 930-931 MHz For
An Advanced Messaging Service

RM No. 7617

COMMENTS OF NORTHERN TELECOM INC.

Northern Telecom Inc. ("Northern Telecom"), by its attorneys, hereby comments on the petition for rulemaking submitted by Telocator.^{1/} Northern Telecom, headquartered in Nashville, Tennessee, is the second largest telecommunications manufacturer in the U.S. The company employs more than 22,000 people in the U.S. in twelve manufacturing plants, thirteen research and development centers, and in marketing, sales and service offices across the country. The company supplies systems to businesses, universities, local, state and federal governments, the telecommunications industry, and other institutions worldwide. Northern Telecom is extensively involved in the development and refinement of mobile telecommunications, including wireless PBXs,

^{1/} Telocator Petition For Rulemaking to Amend Part 22 of the Commission's Rules Concerning the Use of 930-931 MHz For An Advanced Messaging Service, RM No. 7617, Public Notice Report No. 1836, February 7, 1991.

cellular switches and networks, the interconnection of mobile services with landline switches, and the new personal communications services ("PCS").

Comments previously submitted by Northern Telecom and many others in response to the Commission's PCS Notice of Inquiry^{2/} provided strong support for the demand for such services and the pressing need to allocate spectrum to enable the many interested parties to participate in satisfying both existing and future demands.^{3/} An early PCS spectrum allocation would also provide a timely opportunity for U.S. manufacturers and service providers to participate in the global market place for this emerging technology. Responses to the inquiry also identified the need to define longer term plans for evolution of these capabilities to a very broad customer base, including both residential and business users.

Northern Telecom noted that technology exists today to satisfy short term needs, including business applications that require mobility within buildings, behind PBX and key systems, and in public locations, should a minimal amount of spectrum be made available. In their responses, many, including Northern Telecom, envisaged PCS to include two-way communications, voice and data capabilities, common numbering plan, encryption, and spectrum reuse. Indeed, each of the services proposed by Telocator

^{2/} Amendment of the Commission's Rules to Establish New Personal Communications Systems, 5 FCC Rcd 3995 (1990).

^{3/} See generally, Northern Telecom Response to the Second Notice of Inquiry Relating to Preparation for the International Telecommunication Union World Administrative Radio Conference for Dealing with Frequency Allocations in Certain Parts of the Spectrum, GEN. Docket No. 89-554, December 3, 1990; Northern Telecom Response to Notice of Inquiry Relating to Establishment of New Personal Communications Services, Docket No. 90-314, October 1, 1990.

under advanced messaging services ("AMS") would fall within the broader range of PCS as envisioned by Northern Telecom and others.

Telocator claims in its petition that the 930-931 MHz band is not suitable for "CT-2" services, characterized by Telocator as the one-way, U.K. system.^{4/} Telocator also argues that the Reply Comments in the PCS Proceeding confirm that this spectrum is undesirable for such services. Telocator even goes so far as to assert that Northern Telecom "continue(s) to request more suitable spectrum, but prefer(s) the 900 MHz spectrum to nothing at all." (Emphasis added.)^{5/} Despite Telocator's claim, there was nothing in Northern Telecom's earlier filings that indicated or implied that the 930-931 MHz band was in any manner unsuitable for PCS.^{6/} Indeed, it facilitates the early availability of such services.

4/ Telocator Petition at pp. 12 and 17. As indicated earlier, however, Northern Telecom and others anticipate that the early PCS services will be two-way and in other respects more robust than the U.K. Telepoint model.

5/ Telocator Petition at p. 19.

6/ In its petition for rulemaking, Telocator mischaracterizes Northern Telecom's position. What Northern Telecom actually indicated in its earlier comments was:

Northern Telecom's initial suggestion that the 930-931 MHz and 940-941 MHz could be well utilized for this application was echoed by several other commenters, although Northern Telecom would not object if other suitable frequencies were specified. The PCI sharing techniques described in Northern Telecom's initial comments in this proceeding are not dependent on the particular frequencies.
(Emphasis added)

Reply Comments of Northern Telecom in GEN Docket No. 90-314, January 17, 1991 at pp. 7-8.

In sum, given the enormous potential benefits and demand for PCS, Northern Telecom believes that the Commission should not take any actions now that might foreclose the early implementation of these services. Therefore, Northern Telecom urges the Commission to focus its energies and resources on determining the evolution to PCS as detailed in Northern Telecom's and others' earlier filings, and deal with Telocator's request only after addressing these broader issues.

Respectfully submitted,



Albert Halprin
Stephen L. Goodman
Verner, Liipfert, Bernhard,
McPherson and Hand
901 Fifteenth Street, N.W.
Washington, D.C. 20005
(202) 371-6000

Counsel for Northern Telecom Inc.

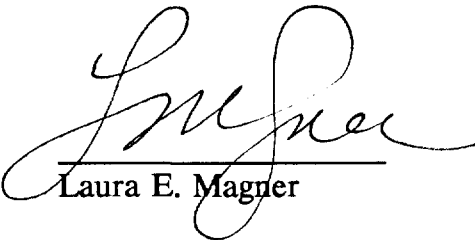
Of Counsel:

John G. Lamb, Jr.
Northern Telecom Inc.
2100 Lakeside Boulevard
Richardson, Texas 75081
(214) 437-8000

Dated: March 11, 1991

CERTIFICATE OF SERVICE

I, Laura E. Magner hereby certify that on the 12th day of March, 1991, a true copy of the foregoing Comments of Northern Telecom Inc. was mailed, postage prepaid, to Richard E. Wiley, Wiley, Rein & Fielding, 1776 K Street, N.W., Washington, D.C. 20005, counsel for Telocator.


Laura E. Magner